

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

RANDY L. HANCOCK,

Plaintiff,

v.

**PRINCETON PROPERTIES
MANAGEMENT, INC. d/b/a
PRINCETON PROPERTIES
APARTMENTS, and
CHRISTIAN H. GARGUREVICH**

Defendants.

CIVIL ACTION NO. 04-CV-10781 DPW

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

In accordance with Local Rule 16.1(D) of the United States District Court for the District of Massachusetts, the parties submit the following joint statement.

I. Obligation of Counsel to Confer

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure and Local Rule 16.1(B), a meeting was held on June 21, 2004, at approximately 1:54 p.m., via telephone, between Martin S. Hancock, Esq. and Denise M. Lauretti, Esq. Defendant, Christian H. Gargurevich or his counsel were not present. Plaintiff's counsel is still attempting to obtain service of process on said Defendant.

II. Initial Disclosures

Each party shall separately file Initial Disclosures in accordance with Rule 26(a)(1) of the

Federal Rules of Civil Procedure and Local Rule 26.2(A) and 35.1(a) by July 29, 2004. A party's filing of Initial Disclosures is a prerequisite to conducting any form of discovery.

III. Proposed Pre-Trial Schedule and Discovery Plan

- A. All discovery shall be completed by no later than December 15, 2004.
- B. Maximum of 7 depositions for each side. The parties reserve the right to request additional depositions for good cause.
- C. Maximum of 7 separate sets of interrogatories for each side. The parties reserve the right to request sets of interrogatories for good cause.
- D. Maximum of 7 separate sets of request for production for each side. The parties reserve the right to request additional requests for production for good cause.
- E. Maximum of 7 separate sets of requests for admissions for each side. The parties reserve the right to request additional requests for admissions for good cause.
- F. Reports from retained experts under Rule 26(a)(2) due from Plaintiff by September 15, 2004 and from Defendants by October 15, 2004.
- G. Dispositive motions must be filed no later than August 15, 2004. Opposition, if any, to dispositive motions must be filed no later than September 7, 2004. Reply briefs, if any, must be filed no later than September 15, 2004.
- H. This case should be ready for trial by January 15, 2005, and is expected to take approximately 3 days.
- I. The parties anticipate that they will be able to avoid unnecessary proof by obtaining admissions of fact and of documents, and that they will be able to stipulate regarding the authenticity of documents.
- J. The parties anticipate a need to obtain advance rulings from the Court on the admissibility of certain evidence.

IV. Trial Before a Magistrate

The Plaintiff hereby consents to refer this matter to a Magistrate Judge pursuant to 28 U.S.C. 636(c) and Rule 73 of the Federal Rules of Civil Procedure for all further proceedings,

including trial.

V. Settlement Proposals

Each party shall separately file a Settlement Proposal required by Local Rule 16.1(C).

VI. Certifications

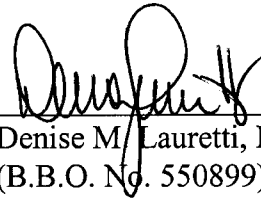
Each party shall separately file the certifications required by Local Rule 16.1(D)(3).

Respectfully Submitted



Martin S. Hancock, Esq.
(B.B.O. No. 657223)

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Attorney for Defendant
Princeton Properties Management, Inc. d/b/a
Princeton Properties Apartments

Dated: June 14, 2004

CERTIFICATE OF SERVICE

I, Martin S. Hancock, Esq., hereby certify that I electronically filed the above document with the Clerk of Court using the CM/ECF system and mailed a courtesy copy to the Clerk of Court, clearly marked "Courtesy Copy – Do Not Scan" in red ink, on the first page of the above document's caption, by first-class United States Mail, postage prepaid, and properly addressed. I also hereby certify that a true and accurate copy of the foregoing was served upon the following party, this 12th day of July 2004, by first-class United States Mail, postage prepaid, and properly addressed.



Martin S. Hancock, Esq.

Denise M. Lauretti, Esq.
Horn & Lauretti
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Boston, MA 02114

Attn: Civil Clerk of Court
John Joseph Moakely
U.S. District Court
1 Courthouse Way, Suite 2300
Boston, MA 02210